

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)

AQUA ACCEPTANCE, LLC

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Plaintiff,

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v.

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Civil No: 1:20-cv-02802-BAH

THE PELICAN GROUP, INC.

\*

CONSULTING, INC., *et al.*

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Defendants.

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**DEFENDANTS' MOTION TO SUBSTITUTE COUNSEL**

Defendants, The Pelican Group Consulting Inc. (the "Pelican Defendant") and Frank Ferguson, hereby file this Motion to Substitute Counsel, and respectfully request that, as set forth in and pursuant to the Consent Order Granting Substitution of Attorney filed simultaneously herewith, the Court substitute NICOLE M. BARNARD, Federal Bar No. 07188, of Neuberger, Quinn, Gielen, Rubin & Gibber, P.A. as counsel of record in place of CARY L. JOSHI and BRITNEY A. LITTLES, both of Bailey & Glasser LLP. For the sake of clarity, SEAN J. BELLEW of Bellew LLC will remain in the case as co-counsel of record for the Pelican Defendant and Frank Ferguson.

Respectfully submitted,

Dated: February 22, 2023

/s/ Nicole M. Barnard

NICOLE M. BARNARD, Federal Bar No. 07188  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22nd day of February, 2023, a copy of the foregoing was served by ECF to:

TROY C. SWANSON  
TCS Legal LLC  
213 Finney Ave.  
Churchville, MD 21028  
410-927-1991 T  
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*Counsel for Plaintiff*

/s/ Nicole M. Barnard  
Nicole M. Barnard